



**IN THE CIRCUIT COURT OF
MADISON COUNTY, ALABAMA**

**MAURICE J. SCOTT SR.,
An individual,**

Plaintiff(s),

v.

**BLACK TITANIC AKA BT AKA
HELEN CLARK AKA HELEN
GRIFFIN AKA OMA; SYREETA L.
McNEAL AKA ANONYMOUS;
HERE 4 HOT TEA; Additional
Fictitious Defendants “A,” “B,” “C,”
“D,” “E,” “F,” “G,” “H,” “I,” “J”
and
“K” thereby intending to refer to
the legal entity, person, firm or
corporation, which was responsible
for or conducted the wrongful acts
alleged in the Complaint; Names of
all the parties are fictitious and
unknown to the Plaintiff at this time
but will be added by amendment
when ascertained,**

Defendant(s).

COMPLAINT

(Jury Trial Requested)

COMPLAINT

1. This action arises out of repeated violations of Alabama state law by Black Titanic AKA BT AKA Helen Clark AKA Helen Griffin AKA Oma (hereinafter “Black Titanic”), Syreeta L. McNeal AKA Anonymous (hereinafter “Anonymous”) and Hear 4 Hot Tea (hereinafter “H4HT”) (collectively, “Defendants”) as a result of their purposeful or reckless publications of false, defamatory, offensive, and harmful statements regarding Plaintiff’s reputation and profession.
2. The Defendants engaged in a race to the bottom to be the first to share the most malicious, salacious, offensive, repulsive, and divisive clickbait content to garner viewership, increase engagement, and financially benefit from their respective audience as “content creators,” “bloggers,” or “vloggers” on YouTube, Instagram, and other social media platforms.
3. Plaintiff found a false and defamatory video stating, amongst other things, that Plaintiff was a convicted felon, wasn’t competent and or qualified to practice law in Alabama, and couldn’t represent clients in court.
4. Plaintiff was made aware of more YouTube videos and comments publishing this false information.

5. To avoid litigation, Plaintiff then made a video on Instagram, and provided public comments on Defendants' defamatory videos, which provided correct information regarding Plaintiff's record and profession and requested a retraction and public apology for the damage caused by the Defendants' false statements, but Defendants have not offered a retraction or an apology, to the contrary, they doubled down and scoffed at the request.

JURISDICTION

6. Personal jurisdiction exists over all Defendants, individually, as they have the necessary minimum contacts with the State of Alabama, and this suit arises out of their specific conduct with and directed to Alabama.
7. This Court has jurisdiction over the subject matter of this action.

VENUE

8. Venue is proper as Plaintiff lives in Alabama, the act or omission complained of occurred in, and at least one of the Defendants has a permanent residence in this county.

PARTIES

9. Plaintiff Maurice J. Scott Sr. (hereinafter “Plaintiff” or “Scott”) is a natural person who is a resident of Alabama.
10. Black Titanic AKA BT AKA Helen Clark AKA Helen Griffin AKA Oma (hereinafter “Black Titanic”) is a natural person who is a resident of Alabama.
11. Syreeta L. McNeal AKA Anonymous (hereinafter “Anonymous”) is a natural person who, upon information and belief, is a resident of Columbia, MO.
12. Here 4 Hot Tea AKA H4HT (hereinafter “H4HT”) is a natural person.
13. Fictitious Defendants “A” through “K” thereby intending to refer to the legal entity, person, firm, or corporation that was responsible for or conducted the wrongful acts alleged in this Complaint; names of the Fictitious parties are unknown to the Plaintiff at this time but will be added by amendment when ascertained.
14. Any reference to any Defendant refers to that Defendant as well as to Fictitious Defendants, and any reference to Defendants refers to all Defendants along with the Fictitious Defendants.

FACTUAL ALLEGATIONS

15. Plaintiff has been a member in good standing of the Alabama State Bar since being admitted on June 18, 2020.
16. Plaintiff graduated from Birmingham School of Law and passed the February 2020 bar.
17. Plaintiff's ability to practice law has never been restricted by the Alabama State Bar after being admitted.
18. Plaintiff has never been arrested, jailed, indicted, charged, imprisoned, convicted of a felony, on probation, on parole, requested or received an expungement, or charged with an offense punishable by indictment.
19. Plaintiff has been an original cast member on the reality television show Love & Marriage: Huntsville since it premiered in January 2018.
20. Love & Marriage: Huntsville follows the lives of individuals who live or work in or around Huntsville, Alabama.
21. The reality show has gained significant popularity and routinely ranks in the top fifty cable television shows for the Saturdays on which it airs.
22. Plaintiff has also gained popularity based on his appearance on the reality show, social media presence, familial and professional life, and charitable work he does.

23. Black Titanic is a content creator, blogger, or vlogger (hereinafter “content creator”) that follows the lives, work, and relationships of individuals on or related to Love & Marriage: Huntsville.
24. Black Titanic promotes her literary works and solicits donations or contributions, likes, and shares of her content from her audience on various social media platforms, including YouTube and Facebook.
25. Black Titanic holds herself out and or promotes herself as doing work comparable to an investigative journalist.
26. Black Titanic holds herself out to be an author who produces various literary works.
27. Black Titanic regularly posts information regarding the cast, participants, and family of members of Love & Marriage: Huntsville.
28. Black Titanic hosts live streams where she includes panelists and guests to communicate with her audience.
29. Black Titanic holds herself out to be a content creator and educator, but upon information and belief, her real motivation is to profit from spreading false, malicious, defamatory, scandalous, and divisive content to enrage and engage her audience in harassment campaigns against various celebrities to elicit a response that will in turn further popularize her platforms.

30. Black Titanic, upon information and belief, accomplishes her goal of emotionally stimulating and manipulating her audience by publishing false, sensationalized information that is not shared on Love & Marriage: Huntsville.
31. Black Titanic, upon information and belief, started a YouTube channel on or around January 3, 2020, which has a total of 412 subscribers as of December 14, 2023.
32. Black Titanic, upon information and belief, published content on YouTube that primarily covered African American protests.
33. Black Titanic, upon information and belief, started a different YouTube channel and changed the direction of her published content on or around April 1, 2020, which has a total of 10.4k subscribers, 840 videos, and 2,315,858 views as of December 14, 2023.
34. Black Titanic, upon information and belief, routinely received less than 395 total views on her videos, with three exceptions, until she started covering information related to Love & Marriage: Huntsville.
35. Black Titanic, upon information and belief, continued to see significant increases in viewership the more she covered information related to Love & Marriage: Huntsville.

36. Black Titanic, upon information and belief, published one of her most viewed live-streamed videos about Plaintiff on or around June 19, 2023 (hereinafter “video 1”), where she made numerous reckless false and defamatory statements, including “Maurice Scott has about eleven criminal records,” “He’s a drug lord,” “He got twelve, twelve counts on him, and most of them he was found guilty,” “I just stumbled upon it... Maurice record was sealed... a drug lord y’all... he pled guilty for possession and manufacturing drugs... he stayed in and out of jail for possession and manufacturing drugs... y’all he got ten charges, he probably got more than that.” [See Exhibit “A” p.1]
37. Anonymous is a natural person who holds herself out to be a practicing attorney.
38. Anonymous is, upon information and belief, Syreeta L. McNeal with an office at 3610 Buttonwood Drive, Suite 200, Columbia, MO 65201.
39. Black Titanic included Anonymous in video 1, in which both Defendants made false defamatory statements regarding Plaintiff’s criminal record and profession.
40. In video 1, Anonymous made the false, defamatory statement, “We’re gonna keep putting the pressure; you just did it. Now we know why Lie-Reece has some kind of law license, but he’s not working; there’s a reason.”

41. In video 1, Anonymous made false, defamatory statements about Plaintiff's professional capacity, competency, and ability to practice law ("I'll tell you Black Titanic if he is misleading on his website about the address he could not only he could lose his license." (BT) " Well what license? He got a certificate honey." (Anonymous) "no, I know, but I'm just saying he won't ever be able to practice." "Exactly, he could be sanctioned, but it's just a bunch of fakeness and fakery.").

42. In video 1, Anonymous and BT made false defamatory statements that Plaintiff had a criminal background that limited his professional ability to practice or go to court ("Now this is the problem, usually with your bar license you should be able to put your shingle up and work." "He's not working right now..." "He can't practice like I would do, go to court, do criminal cases, landlord-tenant cases, civil cases, you name it." "It might be they are limiting him in to do credit repair only, and that's why he's limited." (Black Titanic) "Cause of his background." (Anonymous) "Correct.").

43. In video 1, Anonymous made the false and defamatory statement that Plaintiff wasn't practicing because he wasn't competent or ethical ("I know in my state it's different, it's called the Rules of Professional Conduct. You have to be competent. You have to know the law and be ethical. Well, that

might be his problem why he's not practicing. He can't be ethical, and he can't be competent.”

44.Plaintiff has continuously been a practicing attorney in good standing in Alabama since he was admitted and has not been limited in his ability to practice.

45.Black Titanic, upon information and belief, published one of her most viewed live-streamed videos about Plaintiff on or around November 22, 2023 (hereinafter “video 2”), wherein she made numerous reckless false and defamatory statements. [See Exhibit “A” p.1]

46.Black Titanic, upon information and belief, published a false and defamatory statement when she responded to a comment on video 2, (commentator) “I can't believe this is the same Maurice Scott...” (BT) “Yes it is, an he got a extensive record in Baltimore, the information was given to me personally by someone in the same job description with maurice alledgely.”

47.Black Titanic, upon information and belief, published a false and defamatory statement when she responded to a comment on video 2, (commentator) “I'm in shock,!” (BT) “everyone from michigan an baltimore know maurice as the street pharmacist an my best friend did time after maurice snitch on everybody. they all work for the same suppliers, alledgely.”

48. Black Titanic, upon information and belief, published a false and defamatory statement when she responded to a comment on video 2 (BT) “yes, he got busted in baltimore as well, when he live with kimmie alledgely.”
49. Black Titanic, upon information and belief, published a false and defamatory statement when she responded to a comment on video 2, (commentator) “Careful B. Titanic are you sure this is the same Maurice J. Scott?. Just looking out for your pocket book he will strike back.” (BT) “yes maim, he even has a extensive baltimore records as well, yawl didnt know but everyone knows maurice as a street pharmacist, these scott are fake”
50. Plaintiff has never been to Baltimore.
51. Black Titanic, upon information and belief, published false and defamatory statements when she stated, “He’s still on probation,” “He’s snitching y’all,” and “Maurice sentence 120 months for drugs” while displaying image of Plaintiff in Video 2 (image “Video 2.1”). [See Exhibit “A” p. 2].
52. H4HT is a natural person and content creator that follows the lives, work, and relationships of individuals on or related to Love & Marriage: Huntsville.
53. H4HT promotes her YouTube channel as a place to follow reality shows, including Love & Marriage: Huntsville, where she solicits donations or

contributions, likes, and shares of her content from her audience on various social media platforms, including YouTube.

54.H4HT, upon information and belief, holds herself out and or promotes videos where she attempts to expose information not shared on Love & Marriage: Huntsville.

55.H4HT regularly posts information regarding the cast, participants, and family of members of Love & Marriage: Huntsville.

56.H4HT hosts live streams where she includes commentary about Plaintiff with her audience.

57.H4HT holds herself out to be a content creator who follows reality television, but upon information and belief, her real motivation is to profit from spreading false, malicious, defamatory, scandalous, and divisive content to enrage and engage her audience in harassment campaigns against various celebrities to elicit a response that will in turn further popularize her platforms.

58.H4HT, upon information and belief, accomplishes her goal of emotionally stimulating and manipulating her audience by publishing false, sensationalized information that is not shared on Love & Marriage: Huntsville.

59.H4HT, upon information and belief, started a YouTube channel on January 18, 2015, which has a total of 15.9K subscribers, and 4,306,749 views as of December 14, 2023.

60.H4HT did not do any independent, trustworthy research or investigation to inquire whether the information she published about the Plaintiff's criminal record and professional status was true.

61.H4HT published a false and defamatory statement as a thumbnail image to a video (hereinafter "H4HT Video 1") on YouTube that accused Plaintiff of being a criminal. [See Exhibit "A" p. 2].

62.In H4HT's video on June 22, 2023, she published false defamatory images (hereinafter "H4HT Video 1.1" and "H4HT Video 1.2") attributing multiple criminal charges to Plaintiff. [See Exhibit "A" p. 3].

63.In H4HT's video on June 22, 2023, upon information and belief, she recklessly certified Black Titanic's false information about Plaintiff when she did not reasonably verify the information by stating, "Shout out to Miss black Titanic for dropping this tea because she does some really good investigative reporting."

64.In H4HT's video on June 22, 2023, she knew published defamatory statements were false, had serious doubts as to whether these statements were false, or recklessly avoided the truth of the statements when she stated,

“I don't know what possessed him, you know, other than financial gain, and the court had all of them documented. So, I don't necessarily have to say allegedly, but we just gone say allegedly, and obviously, he could be a better person today.”

65.H4HT, upon information and belief, admitted that she was motivated by profit, exposure, or profited by the false and defamatory statements when she stated “Because hoe If you really felt this serious why haven't you emailed me yet? My email is all on my platform. Why haven't you emailed me hoe? So if you're using this to stay relevant, I'm using it to make money.”

66.H4HT, upon information and belief, wanted Plaintiff to give her platform exposure when she requested that Plaintiff give her YouTube or other social media platforms exposure when she stated “Okay. So like I said, if this is you, okay, under this United Legal bull\$1@#, get on your Instagram so I know it's real, cuz I don't know this is real. This is a troll, for all I know. Okay. I've already spoke to everybody that I needed to speak to about this situation.”

67.H4HT, upon information and belief, made the false and defamatory statement with doubts about the statement's truth when she stated that “He has some charge that is for unlawful possession, and this is in the court for Baltimore City. Imma still say allegedly because, you know, he's swear up

and down that he's gonna sue somebody. I do know why he threatens that you guys do know that he has a certificate, so he can't just be up in a courtroom, he has to be up under someone... what are you doing over in Baltimore with your yellow-looking ass?"

68.H4HT, after being informed by Plaintiff that the information H4HT published was false, H4HT stated she wasn't going to correct the information by stating, "I'm going to acknowledge that a troll got in my comment section on that very old video from 5 months ago trying to play itself as if it is Maurice."

69.H4HT, prior to performing any reasonable research, and after being informed by Plaintiff that the information H4HT published was false, H4HT still published false information about Plaintiff's ability to practice law without meaningfully inquiring whether Plaintiff had the ability to practice law, stating, "Hoe, do you have a certificate or not? Okay, get, get to the point. Do you have a certificate or not? And didn't nobody do any real research cuz you are irrelevant! Do you understand that? Do you understand that? You're irrelevant! Somebody mentions you in a video, and it's a bit interesting; we'll piggyback off of it, but other than that, you're irrelevant. Nobody is doing research on you hoe. Nobody! Nobody!"

70.H4HT, upon information and belief, believed that requesting Plaintiff to mention her YouTube channel or name would increase her platform when she stated, “I got plenty of sh## to say to you, Maurice. Don't fuck#@#* play with me. Okay. So like I said, if this is you, okay, under this United Legal bull\$*#!, get on your Instagram so I know it's real, cuz I don't know this is real. This is a troll, for all I know. Okay. I've already spoke to everybody that I needed to speak to about this situation.”

71.On November 27, 2023, in an effort to minimize the Defendants’ defamatory statements, Plaintiff made a post on Instagram offering the truth and requested a retraction and public apology.

72.Defendants, upon information and belief, knew that Plaintiff requested a retraction and apology for the defamatory statements.

73.H4HT knew that Plaintiff requested a retraction and apology for the false and defamatory statement, but she responded by stating,

“But what I can say is to the hoes that got in my comments trying to say that we getting sued or some shit like that. Hoe, I ain't never scared. I've never been scared of any threats.... This man claimed he such a lawyer then you would know that you need to put an @ on it. Hoe, you cannot come on Beyonce's Internet and try to demand people take down their videos and try to demand things from people, and you don't put an @ on it.”

74.H4HT knew or should have known that she published false statements about Plaintiff.

- 75.H4HT, upon information and belief, failed to reasonably verify whether Plaintiff had a criminal record, but recklessly published BT's assertions of Plaintiff's record.
- 76.Defendants have refused to publicly retract, apologize, or repudiate the false and defamatory statements published about Plaintiff.
- 77.Maurice Scott is an extremely common name, and Defendants intentionally disregarded any readily available evidence that the statements regarding Plaintiff's ability to practice law or criminal record were fictitious.
- 78.Defendants intentionally and or recklessly ignored, and brazenly invented completely false assertions and facts to buttress their conjured-up falsifications when presented with inquiries regarding the veracity of their defamatory statements about Plaintiff. No evidence at all supported the claim that Plaintiff ever had a law "certificate," went to Baltimore, or was the same Maurice Scott that committed the crimes. The assertion that Plaintiff lived in Baltimore is completely unfounded as Defendants knew the probable falsity of the assertion because it was an invention of their own creation. On the contrary, the Alabama State Bar requires a very high standard of conduct for its members before and after being admitted to practice. Defendants could easily have inquired and, in less than five minutes, received an answer.

79. Practicing law without a license in Alabama is a crime, and the Defendants' statements that the Plaintiff was engaged in the practice of law without a license naturally inferred that he was actively engaging in criminal activity.

80. Defendants have unscrupulously pursued their goal of profit regardless of its effect on the Plaintiff and his profession. Their effrontery in regard to the basic norms of societal decency while creating attack videos that flout essential defamation laws is evidenced by the growth of their respective audiences as a direct result of purposefully or recklessly promoting false and defamatory statements about Plaintiff, no matter how unethical, deceitful, or illegal it is.

81. Defendants willfully embraced the deceitful publications of the defamatory statements as they were an integral part of their marketing plan to increase their viewership. Defendants repeatedly requested likes, shares, comments, and donations. They were incentivized to make false assertions with the knowledge that the statements were false or with reckless disregard for the fact that they were false.

82. Defendants were reckless for not knowing the truth of defamatory statements that they published about and concerning Plaintiff.

83. Defendants intended that their audience believe the false and defamatory statements concerning Plaintiff or knew that a reader or listener might

construe the statements to be defamatory by which Defendants were reckless with the statement's implication.

84. Defendants' investigation of the truth of the defamatory statements was grossly inadequate under the circumstances.

85. Defendants caused, induced, or encouraged republication of the false statements about Plaintiff.

86. All the aforementioned defamatory statements about the Plaintiff are false.

87. Defendants knew or should have known that publishing the false statements would likely harm the Plaintiff's reputation and profession.

88. Defendants voluntarily made false and defamatory statements about Plaintiff's reputation and profession.

89. Defendants sufficiently made the false defamatory statements of and concerning Plaintiff.

90. Defendants' defamatory statements are sufficiently factual to be susceptible of being proved true or false.

91. Defendants, in connection with the false defamatory statements, published images of and concerning Plaintiff.

92. As a direct and proximate result of the Defendants' wrongful and unlawful acts, Plaintiff has been damaged.

93. The wrongful acts of the Defendants described caused the following concrete and particularized harms and losses:

- a. Emotional distress including humiliation, fear, worry, and the physical manifestations of same;
- b. Lost time spent attempting to rectify the harm caused;
- c. Harm to personal and professional reputation in the community;
- d. Such other harms and losses as may be shown at trial.

94. Defendants must pay all sums needed to compensate for all harm and losses proximately caused by the prohibited acts described to return Plaintiff to the position enjoyed before the wrongful injury.

95. For those harms and losses reasonably expected to continue, Defendants must compensate for their expected continuing impact and effect,

96. Upon information and belief, all of the Defendants' actions or inaction were performed with common law and or constitutional malice.

97. The harms and losses caused by Defendants will likely be redressed by a favorable judicial decision, through an award of damages, assessment of fines and punitive damages, an award of attorney's fees and all litigation costs, and injunctive relief.

98. Due to the intentional or reckless nature of the wrongful acts described, Plaintiff requests an award of punitive damages and attorneys' fees and

litigation expenses beyond and in excess of those damages necessary to compensate Plaintiff for injuries resulting from Defendants' conduct as a direct and proximate result of the foregoing.

99. Additionally, due to the intentional or reckless nature of the wrongful acts described, Defendants must pay symbolic damages and punitive damages to punish said conduct and deter its reoccurrence.

100. Plaintiff is entitled to an order permanently enjoining Defendants and all and all other persons acting for, with, by, through, or under the authority of Defendants, or in concert or individually, and each of them, from making, disseminating, broadcasting, or publishing any false statement regarding Plaintiff's ability to practice law, profession, occupation, law office, or practicing law in violation of any law, or administrative proceeding, or that Plaintiff has been convicted of an indictable crime, as well as an order requiring Defendants to retract, remove, and repudiate in full all defamatory and disparaging statements made regarding the aforementioned.

FIRST COUNT: LIBEL *PER SE* AS TO DEFENDANTS BT,

H4HT, ANONYMOUS, AND FICTITIOUS DEFENDANTS

101. The allegations contained hereinabove are repeated as if alleged verbatim, to the extent not inconsistent with the allegations of this cause of action.
102. Defendants were aware that at the time Defendants published the defamatory statements about Plaintiff to a third party, the statements were made with knowledge of the falsity or with reckless disregard to its truth or falsity.
103. The statements were made about Plaintiff's profession, trade, and competency and implied Plaintiff was convicted of an indictable offense.
104. The defamatory statements Defendants published were not protected by any recognized privilege.
105. Defendants acted with malice and or actual malice when they made the defamatory statements intending to injure Plaintiff.
106. As a direct and proximate result of the Defendants' above actions, Plaintiff has been damaged as described in this lawsuit including past and future monetary loss, past and future damage, reputational harm to Plaintiff's general and professional reputation, past and future mental distress, and emotional anguish along with physical manifestations, and other damages that will be presented to the trier of fact.

I. SECOND COUNT: SLANDER *PER SE* AS TO
DEFENDANTS BT, H4HT, ANONYMOUS, AND
FICTITIOUS DEFENDANTS

107. The allegations contained hereinabove are repeated as if alleged verbatim, to the extent not inconsistent with the allegations of this cause of action.
108. Defendants were aware that at the time Defendants published the defamatory statements about Plaintiff to a third party, the statements were made with knowledge of the falsity or with reckless disregard to its truth or falsity.
109. The defamatory statements were made about Plaintiff's profession, trade, and competency and implied Plaintiff was convicted of an indictable offense.
110. The defamatory statements Defendants published were not protected by any recognized privilege.
111. Defendants acted with malice and or actual malice when they made the defamatory statements intending to injure Plaintiff.
112. As a direct and proximate result of the Defendants' above actions, Plaintiff has been damaged as described in this lawsuit including past and

future monetary loss, past and future damage, reputational harm to Plaintiff's general and professional reputation, past and future mental distress, and emotional anguish along with physical manifestations, and other damages that will be presented to the trier of fact.

**THIRD COUNT: FALSE LIGHT AS TO DEFENDANTS: BT,
H4HT, ANONYMOUS, AND FICTITIOUS DEFENDANTS**

113. The above allegations are repeated and realleged herein as if set forth verbatim, to the extent not inconsistent with the allegations of this cause of action.

114. The Defendants published false information that placed Plaintiff in a false light when Defendants communicated statements that Plaintiff was a criminal or had a criminal background and couldn't fully practice his profession or was limited in his ability to practice law.

115. The Defendants published this information with knowledge or acted with reckless disregard as to the falsity of the published false information regarding Plaintiff.

116. The action and inaction of Defendants, as described herein, caused great and irreparable injury to Plaintiff.

117. As a direct and proximate result of the Defendants' above actions, Plaintiff has been damaged as described in this lawsuit including past and future monetary loss, past and future damage, reputational harm to Plaintiff's general and professional reputation, past and future mental distress, and emotional anguish along with physical manifestations, and other damages that will be presented to the trier of fact.

**FOURTH COUNT DEFAMATION SLANDER AND LIBEL AS
TO DEFENDANTS BT, H4HT, AND ANONYMOUS, AND
FICTITIOUS DEFENDANTS**

118. The allegations contained hereinabove are repeated as if alleged verbatim, to the extent not inconsistent with the allegations of this cause of action.

119. The statements were made about Plaintiff's profession, trade, and competency and implied Plaintiff was convicted of an indictable offense.

120. The defamatory statements Defendants published were not protected by any recognized privilege.

121. Defendants acted with malice when they made the defamatory statements intending to injure Plaintiff.

122. As a direct and proximate result of the Defendants' above actions, Plaintiff has been damaged as described in this lawsuit including past and future monetary loss, past and future damage, reputational harm to Plaintiff's general and professional reputation, past and future mental distress, and emotional anguish along with physical manifestations, and other damages that will be presented to the trier of fact.

PLAINTIFF demands a trial by jury. Defendants should be held accountable for their unprivileged injuries caused to Plaintiff.

PRAYER FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that judgment be entered against each Defendant for all damages allowable (including statutory, actual, compensatory, nominal, and punitive), costs, expenses, attorney fees, injunctive relief to prevent further violations, and for such other and further relief as may be just and proper.

Respectfully submitted,

/s/Maurice Scott

Maurice Scott (ASB-3167-T48N)

Aluko Collins (ASB-4704-P14P)

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